

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLAN CHIOCCA,)	
)	
PLAINTIFF,)	
)	
V.)	
)	
THE TOWN OF ROCKLAND, DEIRDRE)	C.A. No. 1:19-cv-10482-WGY
HALL, EDWARD KIMBALL, LARRY)	
RYAN, MICHAEL MULLEN JR.,)	
MICHAEL O'LOUGHLIN, RICHARD)	
PENNEY AND KARA NYMAN,)	
)	
DEFENDANTS.)	

**ASSENTED TO MOTION OF DEFENDANT, DEIRDRE HALL, TO
EXTEND TIME TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the Defendant, Deirdre Hall, hereby moves to extend the time within which she must file an Answer or otherwise respond to Plaintiff's Complaint dated March 14, 2019, by eleven (11) days, up to and including August 30, 2019.

Good cause exists to grant this Motion. Counsel for Defendant Hall continues to confer with Plaintiff's counsel regarding Defendant Hall's position on a motion to strike. In order to resolve the dispute, the parties continue to confer regarding the allegations that would be subject to a motion to strike and the possibility of Plaintiff amending the Complaint. Additional time is necessary so that the parties can determine if an agreement can be reached or if motion practice is necessary.

Additionally, Ellen Zucker, counsel for Defendant was on vacation last week. Therefore, the additional time is necessary to complete discussions regarding the parties' position on a motion to strike and/or review, finalize, and complete drafting the Answer to Plaintiff's 465 paragraph

Complaint. This extension will not further delay this matter. Plaintiff's counsel assents to the instant Motion.

WHEREFORE, the Defendant, Deirdre Hall, requests that this Court grant the instant Motion and Extend the Time within which she must answer or otherwise respond to Plaintiff's Complaint up to and including August 30, 2019.

DEFENDANT,
DEIRDRE HALL

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CERTIFICATION

I hereby certify that a copy of the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants and that a paper copy shall be served upon those indicated as non-registered participants on August 19, 2019.

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